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VIA Federal Express

December 19, 1991

Mr. Frank D'Ascensio
Manager of Industrial & Pollution Control
Passaic Valley Sewerage Commission
600 Wilson Avenue
Newark, NJ 07105

Re: Hexcel November Monthly Status of
Alternate Discharge Source for Treated
Ground Water Permit No 1705042 - Fine
Organics Corp.
205 N. Main Street, Lodi, NJ.
HR/E Project No. 60027

Dear Mr. D'Ascensio:

As required in section 2.E.5 of page 8 of Permit no. 17405042 issued to Fine Organics Corp. (FO), we are providing this outline of milestones and progress in finding an alternative for discharge of pretreated ground water. As indicated in Hexcel's letter to you of July 9, 1991, we have not been able to initiate operation of the pretreatment system and therefore have not been able to fulfill the purpose of the 6-month temporary permit.

Hexcel has not been able to put the ground-water pretreatment system in operation due to a requirement by New Jersey Department of Environmental Protection (NJDEP) for a Significant Industrial User (SIU) discharge permit. The SIU permit application was filed on May 28, 1990. In a response by William Boehle, Chief of the DSW/SIU Sections of the Bureau of Industrial Discharge Permits was not required. However, following submittal of the Treatment Works Approval permit application on September 19, 1990, the Permit Section reversed it's decision, requiring a SIU permit. This application was filed on January 11, 1991. Since that time there has been numerous correspondence to the Section regarding issuance of the SIU permit. Their response has been that the permit has a low priority amongst their work load, such that the permit will not be issued for some time. This position is taken, in part, because of proposed rule changes that will give the responsibility for such permits to designated agencies such as the PVSC. Our most recent correspondence, on December 11, 1991, indicates that at the earliest a permit will not be issued until after March 1, 1992.

As a representative for Hexcel, we request a renewal of the Fine Organics Corp. (FO) sewer connection permit as it pertains to the Hexcel Corp. temporary discharge. This is desirable





to maintain the status quo with the water that continues to accumulate in the basement area of FO Building 1. We request that the approval be granted for a period of one year as we await the receipt of the SIU permit. We believe that period of time is necessary to assure that the SIU permit is issued. Following receipt of the SIU permit, the system can be operated as per the terms of FO's 5-year discharge permit. This would allow operation of the system with continuous discharge for a 30-day period to obtain a good sample of water typical of that which will require disposal on a long-term basis. Hexcel requests being allow to continue discharge of 7,200 gallons of water per day as described above during the approximate six month period that is anticipated to be required to evaluate, select, design, install and permit the disposal technique.

In making this request we have summarized the findings for an alternative discharge source to the PVSC industrial sewer for water derived from the Environmental Cleanup Responsibility Act (ECRA) activities at the above referenced site. Our progress to date is summarized below followed by milestones for evaluation of alternatives.

November, 1991
Progress Report
Former Hexcel Corp. Site
Lodi, NJ

Alternate Discharge of Pre-Treated Ground Water

1. Discharge to Surface Water

The discharge to surface water alternative is being addressed cooperatively by HR/E and ENVIRON, Inc.. During November, HR/E evaluated river stage data from the Saddle River for presentation in the Feasibility Study report that is currently in preparation. During the same period, ENVIRON has prepared a draft submittal to the NJDEP in application for an NJPDES permit.

2. Discharge to Ground Water

HR/E technical staff performed analysis of data collected in tests conducted in October. Preliminary results indicate that discharge to shallow ground water (upper overburden aquifer) will require an elaborate and moderately high maintenance system to accept the pretreatment system effluent. Discharge to the lower overburden aquifer will be more difficult due to the potential for off-site migration of contaminants.



3. Discharge to PVSC by Substitution with FO Cooling Water

During a site visit on November 22, 1991, HR/E personnel inspected the FO well water/cooling water distribution system. FO has a single line that supplies water to 19 outlets. A diagram showing the location of piping and tanks supplied with cooling water jackets is being prepared for submittal with the Feasibility Study report.

SIU Permit Status

The lack of an SIU permit is hampering our efforts to complete our evaluation of alternate discharge sources to the PVSC industrial sewer. Hexcel has been in regular contact with Mr. Jeff Thein of the SIU Section to determine the status of the issuance of the SIU permit. Mr. Thein has repeatedly advised that the draft is undergoing Department review. Contact in December has indicated that the draft permit is waiting review by the Bureau Chief.

MILESTONE SCHEDULE

Former Hexcel Corp. Site
205 N. Main Street
Lodi, NJ

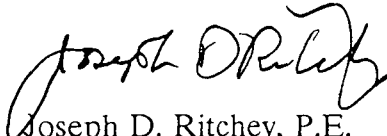
TASK	DATE TO BE COMPLETED
Receive PVSC Discharge Permit Extension	January 1, 1992
Receive SIU Permit from NJDEP	Est. April 1, 1992
Conduct 60-day Test of Pretreatment System	Est. April-May, 1992
Prepare Final Feasibility Study Report	Est. July 1, 1992
Modify Fine Organics Corp. Cooling Water Plumbing IF Deemed Viable	Est. August 1, 1992
Test Fine Organics Corp. Operation Using Pretreatment System Effluent Water	Est. September 1, 1992
Eliminate Discharge of Pretreatment System Effluent Water Directly to PVSC	Est. November 1, 1992





Your acceptance of Hexcel operating in some fashion for six months to a year would allow compliance with ECRA. Please contact us if there is any additional information that you require. Should you have any questions, we can be reached at (800) 338-4396.

Sincerely,
HERITAGE REMEDIATION/ENGINEERING, INC.


Joseph D. Ritchey, P.E.
Project Director

cc: A. William Nosil, Hexcel
Lisa M. Bromberg, Porzio, Bromberg, Newman
Gary Sanderson, ECRA NJDEP
Renee van de Griend, ENVIRON

